## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

MFB FERTILITY INC.,	)	
Plaintiff,	)	Case No. 1:23-cv-17000
v.	)	Judge Robert W. Gettlemar
WONDFO USA CO., LTD.,	)	
Defendant.	)	

## SECOND AGREED MOTION TO EXTEND DEFENDANT WONDFO USA CO. LTD.'S <u>TIME TO RESPOND TO COMPLAINT</u>

Defendant Wondfo USA Co., Ltd. ("Defendant"), by and through its undersigned counsel, hereby respectfully moves the Court to extend the time within which Defendant is required to file a responsive motion or answer or otherwise respond to Plaintiff MFB Fertility Inc.'s ("Plaintiff") Complaint (Dkt. No. 1) to and including April 17, 2024. In support of this Motion, Defendant states as follows:

- 1. Plaintiff filed its Complaint in this action on December 21, 2023. Dkt. No. 1. The Complaint was served on Defendant's registered agent on February 14, 2024. Dkt. No. 7.
- 2. On March 6, 2024, Defendant filed an Agreed Motion to Extend Defendant's Time to Respond to the Complaint. Dkt. No. 9. On March 7, 2024, the Court granted the motion and extended Defendant's response deadline to and including April 3, 2024. Dkt. No. 10.
- 3. The parties are currently exploring ways to resolve this matter without incurring additional costs. In order to facilitate these discussions, the parties have agreed to move for a further extension of Defendant's time to file a responsive motion or answer or otherwise respond to the Complaint to and including April 17, 2024.
  - 4. Defendant does not seek to modify any other applicable deadlines in this case.

5. No party will be prejudiced by the relief requested herein.

WHEREFORE, Wondfo USA Co., Ltd. respectfully requests that the Court extend its time to file a responsive motion or answer or otherwise respond to Plaintiffs' Complaint to and including April 17, 2024.

Dated: March 27, 2024 Respectfully submitted,

/s/ Abram I. Moore
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**CERTIFICATE OF SERVICE** 

I HEREBY CERTIFY that on March 27, 2024, the foregoing document was filed

electronically with the Clerk of the Court using the CM/ECF System, which will send an electronic

copy of the foregoing to counsel of record and constitutes service pursuant to Local Rule 5.9 of

the Northern District of Illinois.

/s/ Abram I. Moore

Abram I. Moore